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Kathleen Sebelius, Governor
Roderick L. Bremby, Secretary

DEPARTMENT OF HEALTH
AND ENVIRONMENT

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Division of Environment

April 17, 2008

RCAP RECEIVED

APR 18 2008

Jerome E. Cibrik, P.G.
Union Carbide Corporation - Remediation Technology Section
P.O. Box 8361
3200/3300 Kanawha Turnpike
South Charleston, WV 25303

RE: Third Quarter 2007 Status Report, Unison Transformer Services, Inc. Site, Fairfax District, Kansas City, Kansas, Consent Order # 97-E-0036

Dear Mr. Cibrik:

The Kansas Department of Health and Environment (KDHE) has completed review of the above referenced document submitted by Union Carbide Corporation (UCC) for the Unison Transformer Services Site located at 3126 Brinkerhoff Road, Kansas City, Kansas. The status report document was prepared on behalf of UCC by CH2M Hill and was received February 14, 2008. KDHE has the following technical review comments and expects written response within 30 days of receipt of this letter.

1. On page 2-1 Unison states that both the air-sparge (AS) and soil vapor extraction (SVE) wells were off line for a majority of the reporting period due to high ground water elevations. KDHE recognizes the technical difficulties presented in this scenario. However, KDHE is also keenly interested in knowing what if any contingencies can be put in place to insure adequate containment of site contaminants. This may be a moot point since it is clear that site related contaminants have indeed migrated a considerable distance off site and since on site source reduction is taking place.
2. There is high variability in ground water flow direction from quarter to quarter that is left unexplained in this report (please refer to the potentiometric surface map from quarters 2 and 3, 2007). Because of the overall context of the site, situated within the Fairfax Industrial District, it would be highly useful if in future reports Unison included other pertinent ground water evaluation measurements including for example: ground water pumping and/or production wells in and around the Unison [ground water] plume; precipitation data for the reporting period; and river stage data.

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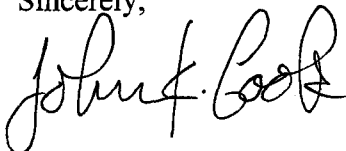
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3. Unison states that since there are pumping influences onsite (the AS and SVE wells) development of a potentiometric surface map for on-site would not represent ground water flow conditions. KDHE believes that Unison should consider developing ground water flow maps for on-site wells as a demonstration that in addition to source reduction, source containment is being maintained.
4. Please include total depth [of well] information in table 4-1.
5. KDHE believes it would be useful to include a crosssectional depiction of on and off-site ground water plume broken down into the constituent parameters (TCE, CIS-1,2-DCE, etc.) This is a repeat request from previous status reports.
6. There appears to be unique perturbation occurring with well 87-D. Please provide an explanation for the highly inconsistent depth to ground water data with respect to the other Unison wells in and around this well.
7. The disc including the analytical data sheets was inadvertently omitted from this report. Please provide a replacement copy of the disc for these analytical data sheets.

KDHE does not require resubmittal of this document. If you have comments or questions I can be reached at johncook@kdhe.state.ks.us or (785) 296-8986.

Sincerely,



John K. Cook, L.P.G.
Professional Geologist
Restoration and Long-Term Stewardship Unit/Remedial Section
Bureau of Environmental Remediation

JKC/mm

- C: D. Ross -> File: C4-105 70168 1.0
Michael B. Davis, EPA Region 7, RCAP
Don Blackert, Key Environmental, Inc.
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